UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

BBB 2. 5028

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ACTION MEMORANDUM

DATE: SEP - 2 2008

SUBJECT: Confirmation of Verbal Authorization for a Removal Action and Request for 12-Month Exemption and Ceiling Increase at the Barry Bronze Bearing Company Site, City of Camden, Camden County, New Jersey

FROM: Terry Kish, On-Scene Coordinator
Removal Action Branch

TO: George Pavlou, Acting Director
Emergency and Remedial Response Division

THRU: Joseph D. Rotola, Chief
Removal Action Branch

Site ID: UX

I. PURPOSE

The purpose of this Action Memorandum is to request a 12-month exemption and ceiling increase as well as document the verbal authorization granted by the Emergency and Remedial Response Division's Deputy Director on June 24, 2008, to conduct a removal action at the Barry Bronze Bearing Company (Site), located at 2204 South 7th Street, City of Camden, Camden County, New Jersey, 08103. The objective of the action was to mitigate the release of heavy metal contaminated sand and dust emanating from the foundry area of the Barry Bronze facility. This action was completed by securing the windows and doors and turning off the water service to the building.

The total funding authorized by the Deputy Division Director was $75,000 of direct extramural funds, of which $65,000 was funded from the Regional removal advice of allowance for mitigation contracting. Authorization of this funding increases the total Direct Extramural project ceiling to $677,000 of which $485,000 was for mitigation contracting. Conditions at the Site continued to meet the criteria for a removal action under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), and documented in Section 300.415(b)(2) of the National Contingency Plan (NCP). There had been a release of a CERCLA designated hazardous substances at the Site, as defined under Section 101(14) of CERCLA.

Loss of contact with the owner of the Barry Bronze Bearing Company led to a U.S. Environmental Protection Agency (EPA) site visit on June 23, 2008, to verify that the facility was secure and still being maintained. The Site visit revealed that the facility was no longer secure and that a significant water release was ongoing which was causing flooding of the foundry area releasing contaminated foundry sand and dust into the environment.

There are no nationally significant or precedent setting issues associated with this removal action.

II. SITE CONDITIONS AND BACKGROUND

The Comprehensive Environmental Response, Compensation and Liability Information System Identification Number for the Site is NJC200400018.

A. Site Description

1. Removal Site Evaluation (RSE)

The Site was used as a foundry for the casting of bronze metal into various molds by the Barry Bronze Bearing Company from 1928 until 1997. The operation consisted of melting various mixtures of copper, lead and tin to make specific alloys. The molten alloys were then poured into molds of sand and steel to form the desired castings. Heavy metal contaminated foundry sands were a waste product generated by the casting process. Prior to the 1980's, when the New Jersey Department of Environmental Protection (NJDEP) required the drumming and proper disposal of this waste, the contaminated sand was used to fill in potholes on Bulson Street, which is situated adjacent to the Site.

The EPA Removal Action Branch (RAB) received a request from the City of Camden in January 2004, to evaluate the Site for a CERCLA removal action. An RSE was initiated in April 2004, and a final RSE report was issued on July 9, 2004. The RSE concluded that high levels of lead, up to 42,400 parts per million (ppm), exist at or near the surface of Bulson Street, located on the north side of the facility. Bulson Street is an unpaved City road which contains an active railroad spur and is routinely traveled by pedestrians. Vehicular traffic along this road was limited due to past dumping activities. Three soil samples collected from Bulson Street were also analyzed for Toxicity Characteristic Leachate Procedure (TCLP) and were determined to be a Resource Conservation and Recovery Act (RCRA) characteristic hazardous waste. Similar contamination inside the facility was also confirmed through wipe and soil samples.

The Site has a front gate which opens to South 7th Street and a fence around the perimeter of the property that is breached in a number of locations. The 19,000 square foot (ft^2) building is of masonry construction with a steel warehouse adjoining the original structure, both of which appear to be structurally intact. At the time of the RSE, all of the windows and doors were locked.

The Site is underlain by the Cretaceous Merchantville Clay which serves as an aquitard in the Potomac-Raritan-Magothy (PRM) aquifer system. The local groundwater flow is generally to the east southeast. There is regional groundwater contamination in Camden; however it is unknown whether the Site has contributed to this contamination. There are no monitoring wells on the property and there has been no groundwater investigation of the Site.

The North Branch of the Newton Creek lies approximately 2,700 feet southwest of the Site and flows into the Delaware River. There is no obvious migration route over land from the Site to the river.

In September 2004, EPA conducted a removal action to address lead contamination along Bulson Street. Soil was excavated to a depth of two feet on both sides of the railroad tracks, geotextile fabric was placed at the base of the excavation and coarse stone was used to backfill the excavation.

The June 23, 2008 Site visit revealed that vandalism at the site has left the facility unsecured. Access to the facility was gained through a window and a large door was opened from the inside leaving a conspicuous access point to pedestrians using Bulson Street. This access point leads directly into the foundry area which houses the most significant lead contamination identified during the RSE. The rest of the building interior is extremely dusty and the dust contains lead concentrations up to 23,200 ppm.

Trespassers stole piping from within the facility leaving a ruptured 1¾ inch copper water service line draining inside the facility at a high rate. Water was observed running inside the foundry into a large rectangular area which is not underlain by concrete and contains lead contaminated foundry sand. The water filled the five foot deep depression in the foundry sand where an underground storage tank had been removed. During the April 2004 RSE, TCLP results obtained from foundry sand contaminated soil collected along Bulson Street, indicated that this material was a RCRA characteristic waste. Although it is unclear whether the water was percolating into the subsurface or had reached another exit point, lead contaminated sand and/or dissolved lead may have released into the environment.

2. Physical location

The facility is located at 2204 South 7th Street and occupies Block 604, Lot 1 in the City of Camden. The 0.6 acre Site contains a 19,000 ft^2 building which is of masonry construction with a steel warehouse adjoining the original structure, both of which appear to be structurally intact and occupy approximately 80% of the property. The remainder of the property is covered by an asphalt parking lot. The Site is accessed from South 7th Street along its western boundary which is a residential area with a church located at the corner. South of the Site are additional residences located on Florence Street in addition to a small school located approximately 200 feet to the southwest of the Site. East of the Site is a large warehouse complex operated by the City of Camden Department of Education. Approximately 750 feet to the southeast is a public school. To the north, lie Bulson Street and an active railroad. The City of Camden

recently constructed 17 multi-family dwellings on a five acre lot which borders the railroad tracks adjacent to the facility. The homes are currently occupied and the closest is approximately 75 feet north of the Site. A site location map is included in Attachment 1.

3. Site characteristics

The facility ceased operations in August 1997, and the building is no longer being maintained by the owner. With the exception of water service, the utilities had been turned off to the facility. Contamination inside the building was documented in the RSE through the collection of soil and wipe samples. The owner has reported historic break-ins to the facility. Recently, trespassers entered the facility seeking scrap metal for recycling purposes, causing a major water release. Vandals have ransacked the office areas overturning furniture and smashing glass. Litter inside of the facility including beer bottles and cigarette packs indicate that people were occupying the facility for activities other than salvaging.

This was the third EPA removal action undertaken at the Site. The objective of the action was to mitigate the threat posed by the release of metal contaminated sand and dust inside of the facility by securing the windows and doors and turning off the water service to the building.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The Site is defined as a facility under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), and hazardous substances in foundry sand being transported by running water constitute a "release", as defined in Section 101(22) of CERCLA, 42 U.S.C. Section § 9601(22). Sampling and analysis conducted at the Site by EPA have identified the following CERCLA hazardous substances as defined in 40 CFR Table 302.4.

Hazardous Substance	Statutory Source for Designation Under CERCLA
Lead	Clean Water Act §307(a) Clean Air Act § 112

During the RSE, screening for lead in site soils as well as inside the facility was conducted using X-Ray Fluorescence (XRF) with confirmatory samples being sent to an off-site laboratory. The results of the RSE sampling indicated that lead, a designated hazardous substance under CERCLA, 40 CFR Table 302.4, is present at extremely high concentrations inside the facility.

Dust on the floors, walls and in the ventilation system within the building is grossly contaminated with lead. Samples of building interior dust showed lead concentrations up to 23,200 ppm. Wipe samples from the walls showed lead concentrations of up to 54,800 micrograms per square foot (ug/ft^2). Samples of sand in the foundry showed lead concentrations up to 17,500 ppm. Samples of foundry sand originating from inside the foundry were collected along Bulson Street. TCLP analysis of these samples yielded lead

concentrations ranging between 11.4 and 287 milligrams per liter (mg/L) indicating the lead contaminated foundry sand is a RCRA characteristic hazardous waste.

Vandalism at the previously secure facility resulted in the rupture of a water line in the facility. The mechanism for release of hazardous substances from the Site was through the discharge of potable water through the foundry area out of the facility, into the environment. The open doorway to the foundry also was a pathway for release of lead contaminated dust to exterior public areas.

5. NPL status

The Site is not currently on the NPL and there are no known plans for its inclusion.

6. Maps, pictures and other graphic representations

Attachment 1 includes a site location map and photographic documentation of the release.

B. Other Actions to Date

1. Previous actions

Barry Bronze Bearing Company ceased its operations in August of 1997, triggering New Jersey Industrial Site Recovery Act (ISRA) requirements (ISRA Case # E97573). In accordance with ISRA a preliminary assessment (PA) and site investigation (SI) were completed by Barry Bronze in March 1998 and February 1999, respectively. In response to a May 1999, NJDEP ISRA inspection, Barry Bronze Bearing Company performed a limited remedial action to address heavy metal contamination in soils on the Site discovered during the SI. The remedial action work was documented in an August 2000, Site Inspection/Remedial Action Report. A second SI was completed in December 2001, focusing on the air compressor room and the furnace pit inside the building. Based on the results of post-excavation sampling completed by Barry Bronze Bearing Company, the remedial work completed at the Site did not adequately address the extensive soil/dust contamination inside or outside the building. The sampling conducted by EPA during the 2004 RSE supports this conclusion.

During the initial RSE site visit on April 8, 2004, approximately 90 bags of potentially asbestos containing construction debris were observed on Bulson Street, adjacent to the Barry Bronze property. The bags had been illegally dumped in this location and were in poor condition. The materials in the bags were sampled and results showed that it contained 40% chrysotile friable asbestos. On April 20, 2004, verbal authorization was given to conduct a time critical removal action to address the threat posed by this material. On April 21, 2004, EPA mobilized to the Site, removed the bags, and transported them in a double lined roll-off container to Pioneer Crossing landfill in Birdsboro, Pennsylvania for disposal. On May 10, 2004, an Action Memorandum was signed documenting the verbal authorization for this removal action. The estimated cost for this action was $2,500 and was effective in removing the asbestos threat.

Following the RSE, an Action Memorandum was completed and signed on September 16, 2004, to address lead contamination along Bulson Street, north of the Barry Bronze Bearing facility. Emergency Rapid Response Services (ERRS) contractors were mobilized to the site on October 25, 2004. Removal activities included the removal of general refuse which had been dumped along Bulson Street, removal of an old fence and vegetation north of the railroad tracks. After coordinating with Conrail regarding work specifications, excavation of Bulson Street was initiated on November 10, 2004. A total of 176 tons of lead contaminated soil was excavated and disposed of off-site. The street was graded and restored and fencing was installed north of the railroad tracks. EPA and ERRS demobilized from the site on May 13, 2005. The estimated cost for this action was $326,000 and was effective in removing the threat or direct contact with lead.

2. Current actions

On June 23, 2008, EPA visited the Site as a result of losing contact with the property owner who had agreed to maintain the facility. The site visit revealed that the building was no longer secure. Windows were broken, a large door to the foundry room was opened along Bulson Street, and a significant water leak was heard coming from inside the building.

On June 26, 2008, EPA mobilized to the Site with ERRS contractors to secure the facility and stop the water leak. ERRS contractors secured the windows and doors with plywood and chains, controlled the water leak allowing it to drain through an existing interior drain prior to entering the foundry area while the water service line was located, excavated and shut-off. While onsite, a representative from the Camden water utility communicated that residents adjacent to the facility had made complaints about children playing in the building, to a realtor whose sign currently hangs on the fence. EPA and ERRS contractors demobilized from the Site on July 1, 2008.

C. State and Local Authorities' Role

1. State and local actions to date

The City of Camden referred this Site to EPA for a removal evaluation in January 2004. The City is actively involved in a revitalization effort of this area. New, low income housing has already been built and is fully occupied to the north and northwest of the Site. The City would like to accept this property from the Barry Bronze Bearing Company for inclusion in their revitalization efforts, but is unwilling to do so until the environmental issues are addressed.

2. Potential for continued State/local response

There were no actions planned or being taken by the State or local government agencies to address the hazardous substances present on-site.

III. THREAT TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Analytical results of sand and dust samples collected by EPA inside the Barry Bronze Bearing Company foundry indicate that hazardous substances, primarily lead, are present in concentrations which may endanger public health. Samples of foundry sand originating from inside the foundry were collected along Bulson Street during the 2004 RSE. TCLP analysis of the samples revealed that the foundry sand is a RCRA characteristic hazardous waste. This hazardous substance, as defined by Section 101(14), of CERCLA, is listed in Table 302.4 of the NCP.

Lead is a cumulative poison where increasing amounts can build up in the body eventually reaching a point where symptoms and disability occur. Particularly sensitive populations are women of child-bearing age, due to the fetal transfer of lead, and children. Cognitive deficits are associated with fetal and childhood exposure to lead. An increase in blood pressure is the most sensitive adverse health effect from lead exposure in adults. Other symptoms include: decreased physical fitness, fatigue, sleep disturbance, aching bones, abdominal pains, and decreased appetite. Long-term exposure can result in severe damage to the brain, blood-forming organs, and the nervous, urinary and reproductive systems. Effects on the kidney, nervous system and hemoglobin forming elements are associated with increasing blood lead concentrations, both in children and adults. Lead can also be a powerful systemic poison causing severe symptoms with acute exposures. Ingestion and inhalation of large amounts may lead to seizures, coma, and death.

The relationship between soil lead concentrations and the consequent impact on blood levels in children has been studied through numerous epidemiological studies. Based on these epidemiological studies, it is generally believed that persistent exposure to soil-borne lead results in an increase in blood lead levels (in children) of 1 to 9 micrograms per deciliter (ug/dl) per 1,000 ppm lead in soil. EPA has determined that lead concentrations at or above 10 ug/dl of blood presents risks to children's health. Although this relationship may become less robust as exposure durations decrease and soil lead levels increase, it nonetheless provides compelling evidence of the potential lead hazard associated with the excessive lead concentrations found in the sand and dust at the Site.

As a result of the water line break and transport of lead contaminated sand and dust to exterior areas, the conditions at the Site continued to meet the criteria for a CERCLA removal action as described in the NCP, 40 CFR 300.415(b)(2). The following criteria are directly applicable to the threats which exist at the Site:

A. Threats to Public Health or Welfare

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;

High concentrations of lead, a CERCLA designated hazardous substance, are present inside the Barry Bronze Bearing Company foundry. Since site maintenance has lapsed, it

has become a target for vandals and trespassers. Vandals broke into the facility to steal scrap metal, causing the water line rupture, leaving the facility open and unsecured. The large door which was opened along Bulson Street, was a conspicuous access point into the facility and leads directly into the foundry room which contains significant lead contamination. Litter inside the building indicates that trespassers have been casually occupying the building, causing lead contaminated dust to become airborne and tracking lead contamination outside of the facility.

(iv) High concentrations of hazardous substances, or pollutants, or contaminants in soils largely at or near the surface, that may migrate; and

There are high levels of hazardous substances in sand and dust on surface areas in the building which may migrate. Dust on the floors, walls and in the ventilation system within the building is grossly contaminated with lead. Samples of building interior dust showed lead concentrations up to 23,200 ppm. Wipe samples from the walls showed lead concentrations of up to 54,800 ug/ft^2. Samples of sand in the foundry showed lead concentrations up to 17,500 ppm. Samples of foundry sand originating from inside the foundry were collected along Bulson Street. TCLP analysis of these samples yielded lead concentrations ranging between 11.4 and 287 mg/L indicating the lead contaminated foundry sand is a RCRA characteristic hazardous waste.

A large portion of the foundry room floor consists of foundry sand. Any water which drains into this area can transport dissolved lead and/or lead particles downward through the native soil or off-site onto public areas. This process may increase the depth of lead contamination. After percolating through the sandy surface soils the contamination may move laterally along the subsurface clay thought to underlie the Site. The recent release of a large amount of water inside the facility caused a release of lead into the environment.

Any persons entering the facility to perform maintenance or otherwise, will be exposed to high concentrations of lead. The inside of the entire facility is covered with a fine gray dust with lead concentrations as high as 23,200 ppm. Any activity including walking causes this material to become airborne which can migrate through open doors and windows of the facility. This fine dust can easily accumulate on shoes, clothing, and skin and be carried off-site by any person entering the building.

(vii) The availability of other appropriate federal or State response mechanisms to respond to the release.

The EPA is the only government agency capable of taking timely and appropriate action to respond to the threat posed by the presence of hazardous substances on the Site.

B. Threats to the Environment

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR 300.415 (b)(2) of the NCP. Factors that support conducting a removal action at the site include:

(iv) High concentrations of hazardous substances, or pollutants, or contaminants in soils largely at or near the surface, that may migrate; and

There are high levels of hazardous substances in sand and dust on surface areas in the building which may migrate. Dust on the floors, walls and in the ventilation system within the building is grossly contaminated with lead. Samples of building interior dust showed lead concentrations up to 23,200 ppm. Wipe samples from the walls showed lead concentrations of up to 54,800 ug/ft^2. Samples of sand in the foundry showed lead concentrations up to 17,500 ppm. Samples of foundry sand originating from inside the foundry were collected along Bulson Street. TCLP analysis of these samples yielded lead concentrations ranging between 11.4 and 287 mg/L indicating the lead contaminated foundry sand is a RCRA characteristic hazardous waste.

A large portion of the foundry room floor consists of foundry sand. Any water which drains into this area can transport dissolved lead and/or lead particles downward through the native soil or off-site onto public areas. This process may increase the depth of lead contamination. After percolating through the sandy surface soils the contamination may move laterally along the subsurface clay thought to underlie the Site. The recent release of a large amount of water inside the facility caused a release of lead into the environment.

The inside of the entire building is covered with a fine gray dust with lead concentrations as high as 23,200 ppm. Any activity including walking causes this material to become airborne which can migrate through open doors and windows of the facility. This fine dust can easily accumulate on pets, shoes, clothing, and skin and be carried off-site.

(v) Weather conditions that may cause hazardous substances, or pollutants, or contaminants to migrate or be released.

The inside of the entire building is covered with a fine gray dust with lead concentrations as high as 23,200 ppm. Wind entering the facility through open windows and doors may cause lead particles to become airborne. Once airborne, lead may migrate to the building exterior through windows and doors causing contamination to become deposited outside of the building.

Heavy rain and snow may enter the building through open windows and doors creating lead contaminated runoff which may transport dissolved lead and/or lead particles off-site into the environment.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action described in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

A. Emergency Exemption

1. There is an immediate risk to public health, or welfare, or the environment.

The large door which was opened by vandals along Bulson Street, was a conspicuous access point into the facility and leads directly into the foundry room which houses the most significant lead contamination. Neighboring residents reported that children were entering the facility through the open door. Trash observed inside the building indicated that trespassers were entering the building on a frequent basis since the door has been opened. The rapid release of water inside the facility is running into the foundry room. A large portion of the foundry area floor consists of foundry sand. Foundry sand filling this area gives way to native sandy surface soils. Any water which runs into this area has the potential to carry dissolved lead or physically transport fine lead particles out of the facility into the environment.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

By resuming response actions at the Site, EPA was able to quickly secure the Site preventing access and further exposure to lead contamination inside of the building. Water service to the foundry was discontinued eliminating the release of water inside the lead contaminated foundry.

3. Assistance will not otherwise be provided on a timely basis.

EPA attempted to contact with the owner of the Barry Bronze Bearing Company property to mitigate the release. The owner was unable to provide an adequate response to the release. The local water utility company was unable to locate the water shut-off.

No other governmental or potentially responsible party (PRP) could provide assistance to mitigate the public health and environmental threats within the time constraints at the Site.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The purpose of this removal action was to eliminate the threat of direct contact with lead posed to the public and environment. To mitigate the threats posed by this Site, EPA has boarded up broken windows, chained security grates to intact window frames and secured doors and gates using padlocks and chains. Water from the ruptured water line was directed to a nearby drain in lieu of the lead contaminated foundry area while the water service line was located. Due to the absence of a typical shut-off valve, EPA excavated

the parking lot of the facility in order to locate the water service line. Once located, the water was shut-off at the water main. A shut-off valve box was installed so that water service can be restored if necessary. No disposal efforts were taken during this action. No post removal site controls are required at the Site.

2. Contribution to remedial performance

The removal action at the Site was consistent with the requirement of Section 104(a)(2) of CERCLA, which states, "any removal action undertaken...should...to the extent practicable, contribute to the efficient performance of any long-term remedial action with respect to the release or the threatened release concerned." The removal actions implemented to date are consistent with any future remedial action.

3. Description of alternative technologies

No new technologies were utilized in the completion of this removal action.

4. Engineering Evaluation/Cost Analysis (EE/CA)

Due to the time-critical nature of this removal action, an EE/CA was not and will not be prepared.

5. Applicable or relevant and appropriate requirements (ARARs)

ARARs that are within the scope of this removal action were met to the extent practicable.

6. Project schedule

Field activities were initiated on June 26, 2008 and completed on July 1, 2008.

B. Estimated Costs

The estimated costs for the completion of this project are summarized below.

Direct Extramural Costs	Funding Authorized for Previous Actions	Verbal Funding Authorized for this Action	Total Funding Authorized and Requested
Regional Allowance Costs (Total clean-up contractor including labor, equipment and materials)	$420,000	$65,000	$485,000
20% Contingency	$0	$0	$0
Total ERRS Costs	$420,000	$65,000	$485,000
Other Extramural Costs Not Funded From the Regional Allowance	$0	$0	$0
Total RST 2 Costs	$75,000	$10,000	$85,000
Subtotal, Extramural Costs	$490,000	$75,000	$565,000
20% Extramural Cost Contingency	$107,000	$0	$107,000
Total Direct Extramural Costs	$602,000	$75,000	$677,000

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the proposed actions described in this memorandum were not implemented, the threats posed by the Site would persist. The residential population surrounding this area is increasing as new homes are being built and families with small children take up occupancy. With more people in proximity to this area, the threat of exposure via direct or indirect contact will correspondingly increase. Exposure to the contamination posed from the Site is of particular concern due to the adverse health effects of lead on children.

VIII. OUTSTANDING POLICY ISSUES

There is no known outstanding policy issue associated with the Site at the present time.

IX. ENFORCEMENT

The owner of the Barry Bronze Bearing Company was identified and was cooperative with EPA in trying to resolve the environmental concerns at the Site. A limited ISRA cleanup was performed by the owner in 2001, with moderate success. The owner has indicated that he is financially incapable of performing any additional remediation of the Site. EPA continues to investigate whether the owner has the ability to pay any response costs incurred by EPA in conducting the 2004/2005 removal action at the Site.

EPA's Total Estimated Project-Related Costs

The total EPA cost for this removal action based on full-cost accounting practices that will be eligible for cost recovery is estimated to be $1,050,620 and was calculated as follows:

COST CATEGORY	AMOUNT
Direct Extramural cost	$677,000
Direct Intramural Cost	$125,000
Subtotal Direct Costs	$802,000
Indirect costs (Indirect Regional Cost Rate 31%)	$248,620
Estimated EPA Costs eligible for Cost Recovery	$1,050,620

X. RECOMMENDATION

This decision document represents the selected removal action for the Barry Bronze Bearing Site, located in the City of Camden, Camden County, New Jersey. This document was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

The total funding requested in this confirmation of verbal authorization for a removal action is $75,000, of which $65,000 is for mitigation contracting. If approved, the new total project ceiling will be raised to $677,000, of which $485,000 will be from the Regional removal advice of allowance.

I recommend your approval of proposed 12-month exemption, ceiling increase, and removal action. Please indicate your formal authorization for the removal action at the Barry Bronze Bearing Site, as per current Delegation of Authority, by signing below.

APPROVAL: _____ **DATE:** 9/2/08
for George Pavlou, Acting Director
Emergency and Remedial Response Division

DISAPPROVAL: _____ **DATE:** _____
George Pavlou, Acting Director
Emergency and Remedial Response Division

cc: (after approval is obtained)
J. LaPadula, ERRD-DD
J. Rotola, ERRD-RAB
D. Harkay, ERRD-RAB
B. Grealish, ERRD-RAB
T. Kish, ERRD-RAB
C. Petersen, ERRD-NJRB
R. Basso, ERRD
D. Karlen, ORC-NJSFB
J. Fajardo, ORC-NJSFB
P. Brandt, PAD
R. Manna, OPM-FMB
T. Grier, 5202G
P. McKechnie, OIG
J. Maher, NJDEP
L. Rosman, NOAA
A. Raddant, DOI
C. Kelley, RST

ATTACHMENT 1

Maps, pictures and other graphic representations

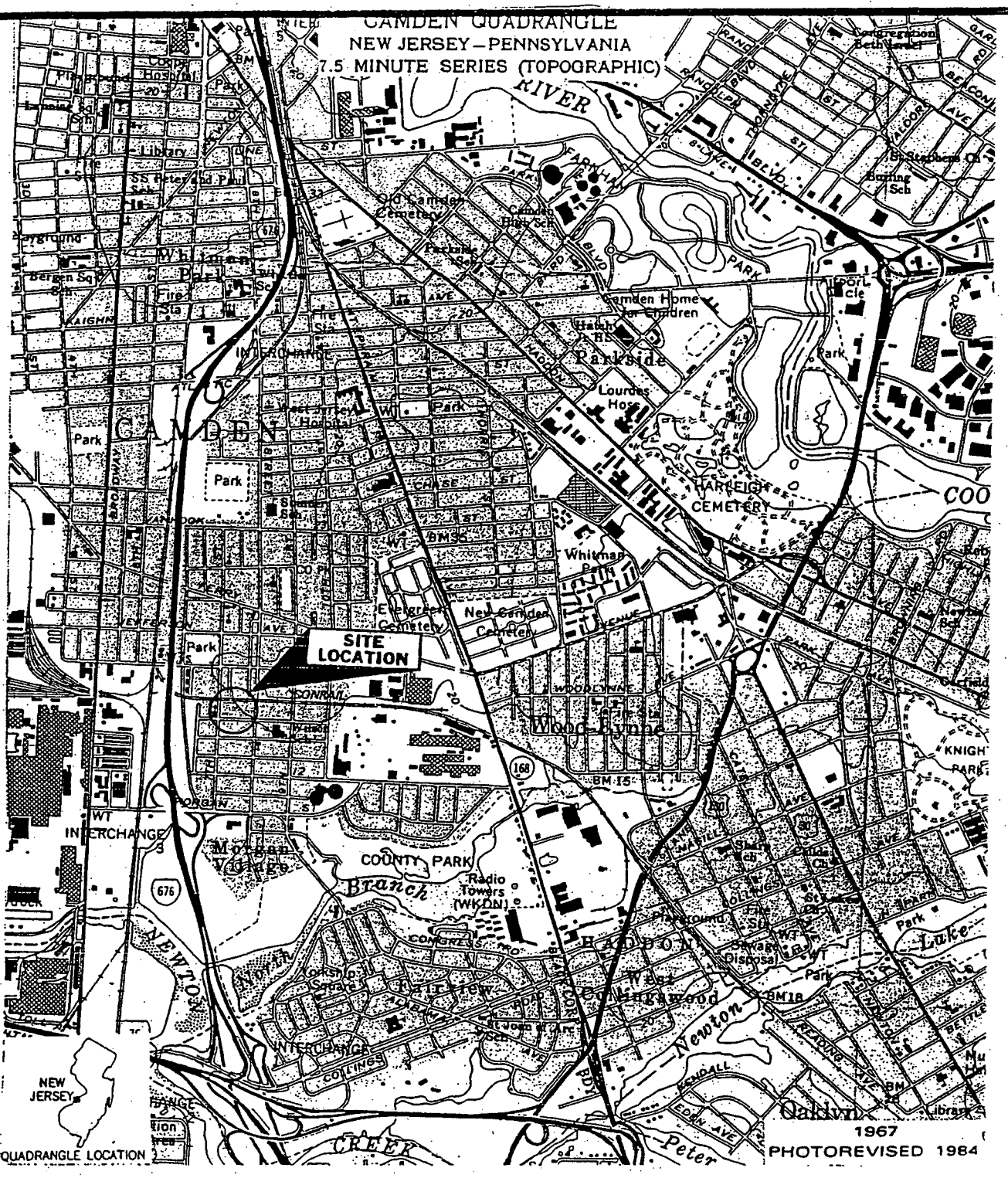


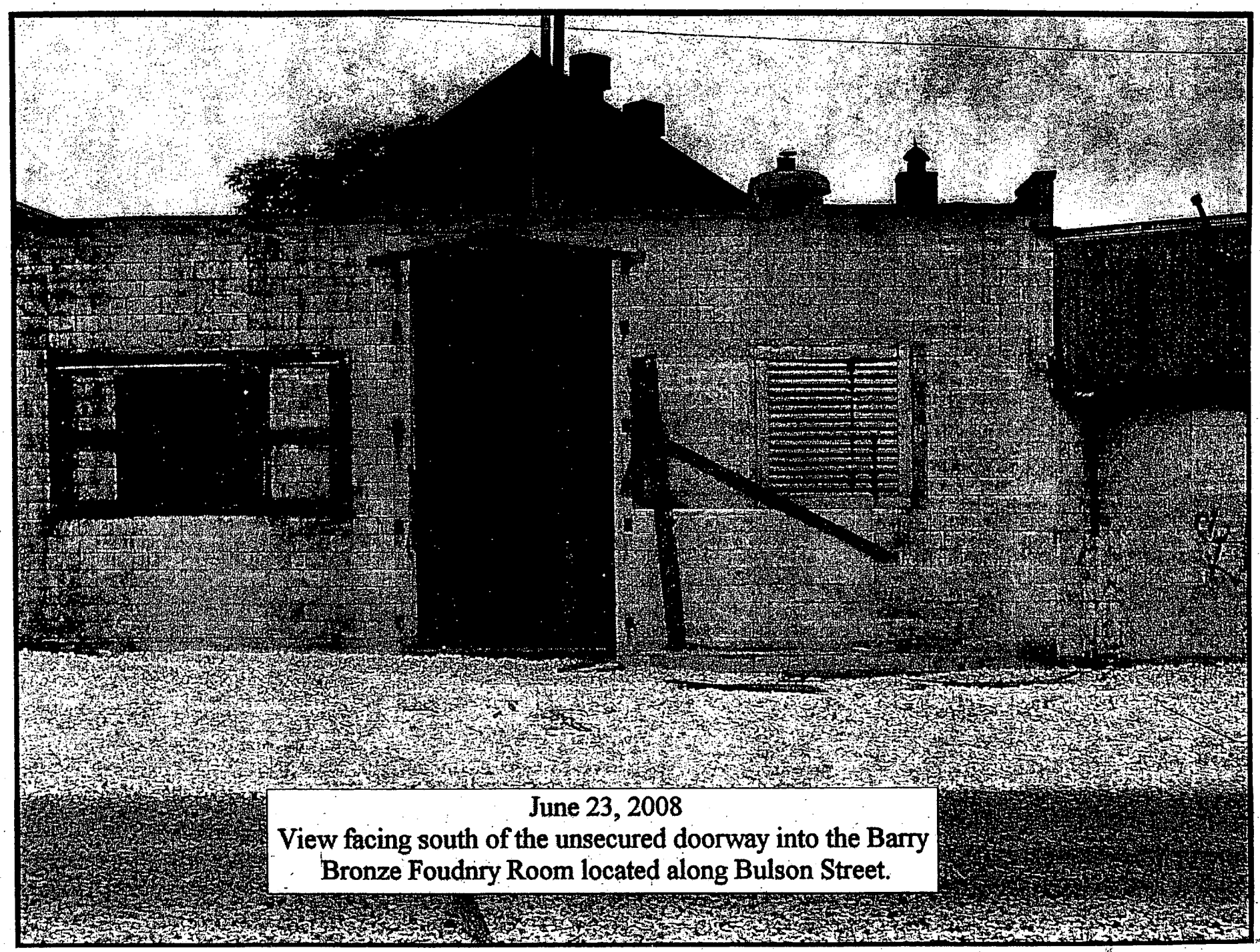
FIGURE 1.0:

Barry Bronze Bearing Company, Inc.
2204 South 7th Street

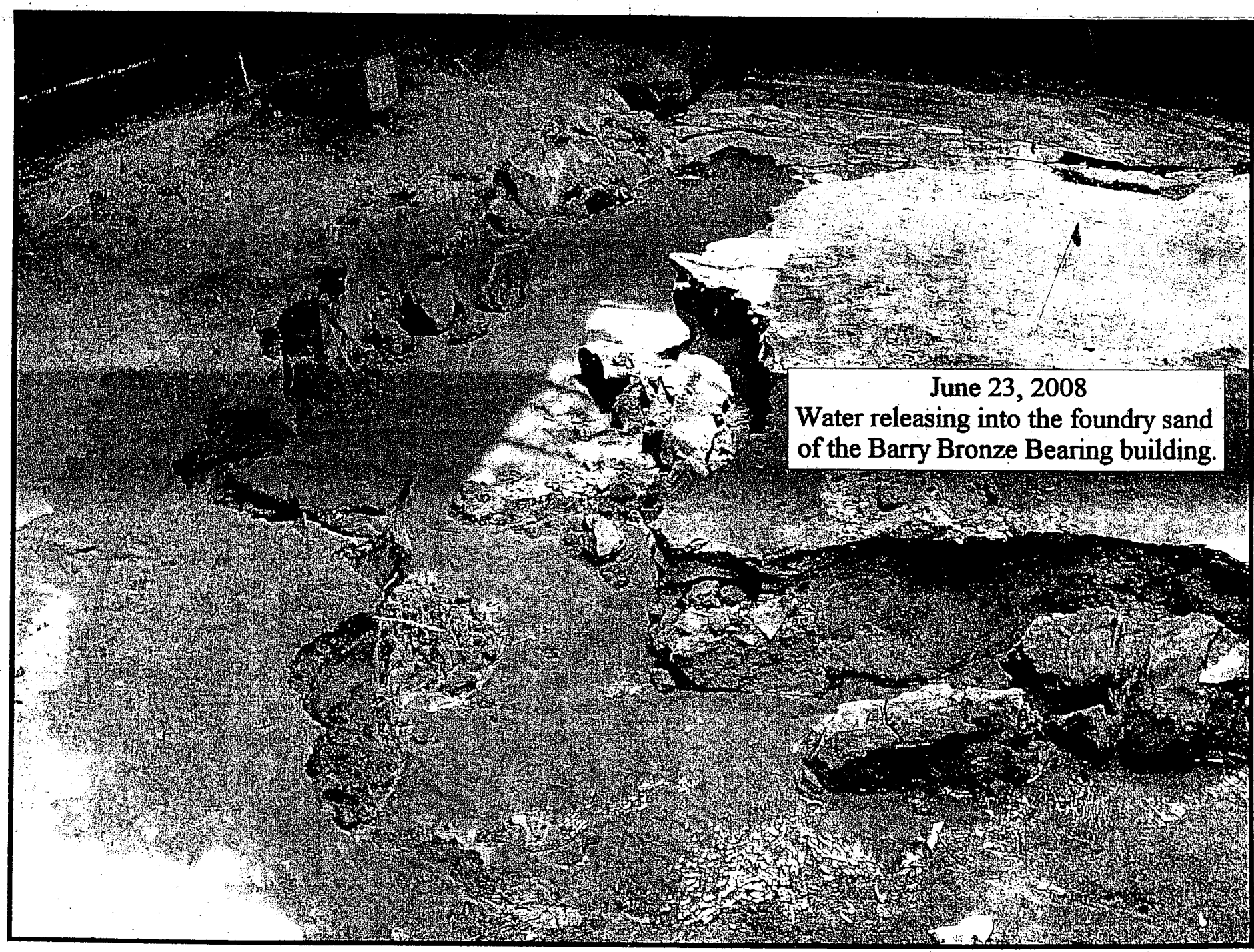
ENVIRONMENTAL, INC.
9 East Stow Road
Marlton, New Jersey 08053
856/985-8800 www.ttienv.com

SCALE	DRAWN BY	DATE
1" = 2,000'	USGS	12/01
PROJECT	APP'D BY	DRAWING NO.
01-479	RTP	1.0

BBB 2. 5043



June 23, 2008
View facing south of the unsecured doorway into the Barry Bronze Foudnry Room located along Bulson Street.


June 23, 2008
Water releasing into the foundry sand
of the Barry Bronze Bearing building.

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